Statement for the Record of John Bozzella
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House Committee on Energy and Commerce
Subcommittee of Digital Commerce and Consumer Protection
Hearing on "Driverless Cars: Road to Deployment"
February 14, 2017

On behalf of the Association of Global Automakers ("Global Automakers"), I am pleased to provide the following statement for the record to the House Energy and Commerce Committee Subcommittee on Digital Commerce and Consumer Protection hearing on "Driverless Cars: Road to Deployment."

Global Automakers represents international automobile manufacturers that design, build, and sell cars and light trucks in the United States. These companies have invested $56 billion in U.S.-based facilities, directly employ nearly 100,000 Americans, and sell 47 percent of all new vehicles purchased annually in the country. Combined, our members operate more than 300 production, design, R&D, sales, finance and other facilities across the United States.

The United States auto industry now stands at the leading edge of a technological revolution in which connected and automated vehicles are redefining how we think about transportation, and the Committee's continued focus on this topic is important, valuable, and welcomed. Connected and automated vehicles can greatly improve safety, reduce energy consumption and enhance mobility, and this innovation will fuel the jobs of the future.

The task before policymakers, on this Committee and at other branches and levels of government, is to foster the proper legal, regulatory and market environments to enable the benefits of connected and automated vehicles. Accordingly, we need clear federal leadership to ensure that we have a uniform vehicle safety policy that promotes innovation, allows thorough testing, and leads to the responsible deployment of these revolutionary technologies.

In 2016, the Department of Transportation took important steps with the publication of the Federal Automated Vehicle Policy and the issuance of a proposed rule on vehicle-to-vehicle

communications. Now, the new Administration must continue that work. Congress has the opportunity to move the ball forward by (a) directing the National Highway Traffic Safety Administration (NHTSA) to update Federal Motor Vehicle Safety Standards to accommodate automated technologies, and (b) clarifying that vehicle design and performance standards are the exclusive responsibility of the federal government by preempting state laws in these areas.

Connected and automated vehicles represent the next giant step in motor vehicle safety. Over the past several decades, our members have made tremendous strides in advancing safety through the design of enhanced occupant restraint systems and improved vehicle crashworthiness. Today, we are moving from mitigating the consequences of crashes to preventing them altogether. Our members are at the forefront of this innovation. They have made, and continue to make, substantial investments in the research and development of automated vehicle systems and other advanced automotive technologies in the United States supporting quality jobs for American workers.

It is important to note that automated vehicle technologies are much broader than the concept of a self-driving car. For example, a number of vehicles on the road today provide some automated functionality through advanced crash-avoidance and convenience features such as crash-imminent braking, lane keeping assist, and adaptive cruise control. These systems are designed to provide support to the driver only in certain situations, and vehicle-only control is not typically sustained over an extended period of time. Global Automakers believes that all levels of automation should be allowed to advance to move these technologies forward. Consequently, appropriate frameworks must be in place to encourage both the evolution of existing systems as well as the testing and deployment of "driverless" systems.

The development and deployment of automated driving systems is a challenging task, requiring comprehensive testing to evaluate how the technology will perform in a complex real-world driving environment. This testing will involve computer simulation, closed track, and public road testing to validate and verify the performance of vehicle sensors and decision algorithms. Understandably, the testing of "driverless cars" on public roads raises several questions and has led to a significant policy debate at both the federal and state level. While all parties agree testing

must be conducted in a safe and transparent manner, we must also ensure that a patchwork of state standards does not hinder the testing and deployment of automated technologies.

Despite NHTSA's efforts to provide direction and guidance through the Federal Automated Vehicle Policy, Global Automakers members remain concerned that states continue to push legislation and regulations that will threaten nationwide deployment of automated vehicles. This concern is borne out by the fact that although the federal guidance is intended to provide a national approach to automation that can adapt to the pace of technology, many states nevertheless have introduced, debated and, in some cases, enacted legislation addressing automated vehicles. This year alone, more than 40 legislative proposals related to automated vehicles have been introduced in the states. These laws often include conflicting definitions of what constitutes an automated vehicle as well as various vehicle requirements that can dictate the way automakers must design and manufacture systems.

A patchwork of state laws establishing inconsistent design and performance criteria for automated vehicles will delay the delivery of real-world safety benefits to the American public and would be unworkable for the industry. It could in theory even mean that people in different states will not have the same access to the latest crash-avoidance technologies. For that reason, we believe that NHTSA should lead, as it is the expert federal agency charged with ensuring that motor vehicles are designed and manufactured to meet national safety performance standards. Such leadership will enable the safe and consistent development of automated vehicles that can be safely driven across the 50 states. State governments also can play a role but, in contrast to the federal government, need to focus on issues related to the safe operation of those vehicles on their roads, such as driver licensing, vehicle registration, and insurance.

Congress can act to ensure that there is a workable, national framework for the development, testing and deployment of automated vehicles. First, Congress can spur innovation by directing NHTSA to evaluate existing Federal Motor Vehicle Safety Standards and other regulations to ensure that there are no unnecessary barriers to the safe deployment of automated systems. Second, Congress can clarify that individual states do not have authority to issue policies related to vehicle design and performance by preempting such standards.

The automobile industry continues to provide innovative technologies with demonstrable safety, mobility, and efficiency benefits. To achieve these benefits, there must be close collaboration and coordination among government, industry, academia, and other stakeholders. We must also ensure the policy environment supports a national approach. Global Automakers and our member companies believe that connected and automated vehicles represent a critical step towards our shared long-term goal of safer, cleaner, and more efficient vehicle transportation. Right now the United States is leading the way in connected automation innovation; we must ensure that our policy frameworks allow our country to stay in the lead.